

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

DIAMOND SPORTS GROUP, LLC, *et al.*,<sup>1</sup>  
  
Debtors.

Chapter 11

Case No. 23-90116 (CML)

(Jointly Administered)

**DECLARATION OF LEO J. HINDERY, JR. IN SUPPORT OF DEBTORS’  
OBJECTION TO (I) EMERGENCY JOINT MOTION OF MAJOR LEAGUE  
BASEBALL AND CERTAIN MAJOR LEAGUE BASEBALL CLUBS TO COMPEL  
PERFORMANCE UNDER TELECAST RIGHTS AGREEMENTS, OR, IN THE  
ALTERNATIVE, TO COMPEL ASSUMPTION OR REJECTION OF TELECAST  
RIGHTS AGREEMENTS AND FOR RELIEF FROM THE AUTOMATIC STAY; (II)  
EMERGENCY MOTION OF AZPB LIMITED PARTNERSHIP TO COMPEL  
DEBTORS TO PERFORM UNDER THE TELECAST RIGHTS AGREEMENT, OR, IN  
THE ALTERNATIVE, TO COMPEL ASSUMPTION OR REJECTION OF THE  
TELECAST RIGHTS AGREEMENT AND RELIEF FROM THE AUTOMATIC STAY;  
AND (III) RANGERS BASEBALL EXPRESS LLC’S JOINDER TO MAJOR LEAGUE  
BASEBALL AND CERTAIN MAJOR LEAGUE BASEBALL CLUBS’ LIMITED  
OBJECTION TO THE DEBTORS’ EMERGENCY MOTION TO USE CASH  
COLLATERAL AND MOTION TO COMPEL PERFORMANCE**

I, Leo J. Hindery, Jr. hereby declare as follows:

1. I am an independent consultant with expertise in the regional sports network industry, and have been retained by counsel for the Debtors in connection with the Debtors’ *Objection To (I) Emergency Joint Motion Of Major League Baseball And Certain Major League Baseball Clubs To Compel Performance Under Telecast Rights Agreements, Or, In The Alternative, To Compel Assumption Or Rejection Of Telecast Rights Agreements And For Relief*

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<sup>1</sup> A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://cases.ra.kroll.com/DSG>. The Debtors’ service address for purposes of these chapter 11 cases is: c/o Diamond Sports Group, LLC, 3003 Exposition Blvd., Santa Monica, CA 90404.

*From The Automatic Stay; (II) Emergency Motion Of AZPB Limited Partnership To Compel Debtors To Perform Under The Telecast Rights Agreement, Or, In The Alternative, To Compel Assumption Or Rejection Of The Telecast Rights Agreement And Relief From The Automatic Stay; And (III) Rangers Baseball Express LLC's Joinder To Major League Baseball And Certain Major League Baseball Clubs' Limited Objection To The Debtors' Emergency Motion To Use Cash Collateral And Motion To Compel Performance (the "Omnibus Objection").*

2. Attached hereto as Exhibit A is a true and correct copy of my Revised Declaration dated May 26, 2023, which sets forth a true and complete statement of my opinions in connection with the Omnibus Objection and the bases therefor as of May 26, 2023.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed in Cornelius, North Carolina on May 27, 2023.

/s/ Leo J. Hindery  
Leo J. Hindery, Jr.

**Certificate of Service**

I certify that on May 27, 2023, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ John F. Higgins

John F. Higgins

**EXHIBIT A**

**FILED UNDER SEAL**